

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Petition of Landfill Gas Management, LLC,)	
for an Order and determination that the Qualified)	
Solid Waste Facility located adjacent to the)	Docket No. 02-0062
Mallard Lake Landfill in Hanover Park, Illinois)	
will continue to be a QSWEF after completion)	
of a proposed expansion of capacity.)	

**MOTION OF GAS RECOVERY SERVICES OF ILLINOIS, INC. TO REOPEN THE
RECORD FOR THE LIMITED PURPOSE OF RECEIVING ADDITIONAL DIRECT
TESTIMONY**

Gas Recovery Systems of Illinois, Inc ("GRSI"), the Petitioner in the captioned proceeding hereby respectfully requests that the record in this proceeding be reopened for the sole purpose of receiving the additional Direct Testimony of Alan Purves which is attached hereto. GRSI further requests (1) that it be permitted to file the aforesaid additional Direct Testimony instanter; and (2) that such additional Direct Testimony be received in evidence based on Mr. Purves' affidavit which is attached to such testimony.

Respectfully submitted,

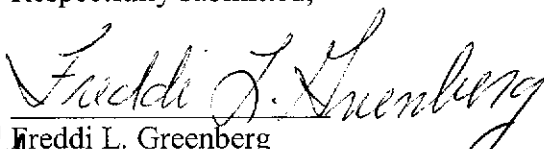
OFFICIAL FILE

I.C.C. DOCKET NO. 02-0062

App Exhibit No. 1- Late Filed

Witness _____

Date 11/21/03 Reporter RW



Freddi L. Greenberg
Attorney for Gas Recovery Services of Illinois, Inc.
1603 Orrington Avenue, Suite 1050
Evanston, Illinois 60201
Phone: (847) 864-4010
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November 13, 2002

DIRECT TESTIMONY OF

ALAN PURVES
CHIEF OPERATING OFFICER
OF
GAS RECOVERY SERVICES OF ILLINOIS, INC.

IN SUPPORT OF THE

Petition of Gas Recovery Services of Illinois, Inc., for an Order and determination that the Qualified Solid Waste Energy Facility located adjacent to the Mallard Lake Landfill in Hanover Park, Illinois, will continue to be a QSWEF after completion of a proposed expansion of capacity

Docket No. 02-0062

1. Q. Mr. Purves, what is the purpose of this additional direct testimony?
A. The purpose of this testimony is to correct the record by substituting a corrected Notice of Self-Recertification of the Facility that is the subject of this proceeding, for the Notice of Self-Recertification that was originally filed in this docket. That document is attached to this testimony as Attachment APA-1 was filed with FERC at my direction and under my supervision and is corrected as to the anticipated increase in generating capacity. I also want to further discuss the fuel that is consumed at the Mallard Lake QSWEF.
2. Q. Does the Mallard Lake QSWEF consume natural gas or other fossil fuel in addition to landfill gas?
A. The Facility consumes no natural gas. The Facility consumes small amounts of diesel fuel solely for startup purposes as described in Attachment APA-1. With that small exception, the Facility is fueled entirely by landfill gas.
3. Q. Do you plan to supplement the landfill gas consumed by the QSWEF by increasing your use of fossil fuel?
A. No, at present we have no such plans. If, in the future, we determine that it would be appropriate to increase the use of fossil fuel, we will not burn natural gas at the QSWEF or modify the use of diesel fuel beyond the startup use described in Attachment APA-1, without first seeking an order

from the Illinois Commerce Commission stating that the Facility will not lose its status as a QSWEF as a result of any such increase in fossil fuel use.

4. Q. Mr. Purves, do you have anything further to add to your direct testimony?

A. No, I do not.


AFFIDAVIT

STATE OF California)

COUNTY OF Alameda)

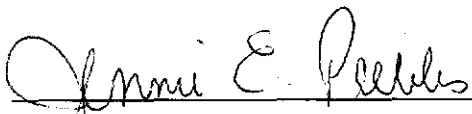
ss.

Alan Purves, being duly sworn, deposes and says that the statements contained in the foregoing direct testimony are true and correct to the best of his knowledge, information and belief, and that such prepared direct testimony constitutes his sworn testimony in this proceeding.

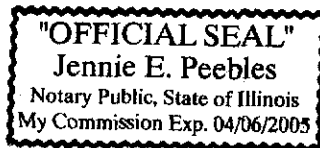


Alan Purves
Chief Operating Officer
Gas Recovery Services of Illinois, Inc.
5717 Brisa Street
Livermore, California 94550
Phone: (925) 606-3701
Fax: (925) 606-3710

Subscribed and sworn before me
this 13th day of Nov., 2002.



Notary Public





FILED
OFFICE OF THE SECRETARY

02 JUL 19 AM 8:51

FEDERAL ENERGY
REGULATORY COMMISSION

July 17, 2002

Office of the Secretary
Federal Energy Regulatory Commission
888 North First Street NE
Washington, DC 20426

Subject: Self-Recertification of QF 93-069-004 Mallard Lake
Landfill Electric.

This letter is to notify the Federal Energy Regulatory Commission that the subject small power production facility will be expanded to include a maximum of 10,000 kilowatts of additional capacity. This facility is owned by Gas Recovery Services of Illinois, Inc., which is wholly owned by Landfill Gas Management, L.L.C. This is a notice of Self-Recertification for this facility asserting its compliance with the Commission's technical and ownership criteria.

This is an existing qualified small production facility that uses landfill gas as its primary fuel. The ownership is not a electric utility, electric utility holding company or any combination thereof nor does any company owned by either own an interest in this facility.

Attached to this letter you will find 14 copies of FERC form 556 detailing this facility's ownership, equipment and the type of fuel used. Please return one of these copies in the envelope provided with the appropriate FERC stamp of reception.

If you have any questions please direct them to the undersigned at 925-606-3700 ext. 3721 or by email to nourot@grsi.net.

Sincerely,

A handwritten signature in dark ink, appearing to read "Matthew Nourot", written over a horizontal line.

Matthew Nourot, PE
Engineering/Environmental Manager

Cc: Illinois Commerce Commission
Commonwealth Edison Company QF Administration

Gas Recovery Systems, Inc.

5717 Brisa Street, Livermore, CA 94550 • tel (925) 606-3700 • fax (925) 606-3710

FERC FORM 556
CERTIFICATION OF QUALIFYING FACILITY STATUS
FOR AN EXISTING SMALL POWER PRODUCTION FACILITY

PART A: GENERAL INFORMATION

- 1a. Mallard Lake Landfill Electric
QF 93-069-0004
Self-recertification
- 1b. Gas Recovery Services of Illinois, Inc.
5717 Brisa Street
Livermore, CA 94550
- 1c. This facility is owned by Gas Recovery Services of Illinois, Inc., which is wholly owned by Landfill Gas Management, L.L.C. Landfill Gas Management, L.L.C., is owned by the following in the percentages shown:

Gas Recovery Systems, Inc.	49%
Jomarlin Investments Inc.	17.85%
Atfin Holdings Inc.	17.85%
Landfill Gas Management Inc.	10.20%
Ronald J. Poland	2.55%
Alan J. Purves	2.55%

The operator of this facility is Gas Recovery Services of Illinois, Inc.

No electric utility, electric utility holding company or any combination thereof or any company owned by either owns an interest in this facility. The owners of this facility are not engaged in the generation or sale of electric power nor have any ownership or operating interest in any electric facilities other than qualifying facilities.

- 1d. Signature of authorized individual


Alan Purves

Alan Purves is Chief Operating Officer of Gas Recovery Services of Illinois, Inc.

2. Contact Person:

Matthew Nourot, PE
Engineering/Environmental Manager
Phone: (925)-606-3700 extension 3721
Email: nourot@grsi.net
Gas Recovery Systems, Inc.
5717 Brisa Street
Livermore, CA 94550

3a. Location of facility to be certified:

State: Illinois
County: Du Page
City: Hanover Park
Street Address: 26 West 570 Schick Road

3b. This facility sells electricity to Commonwealth Edison.
Commonwealth Edison can provide maintenance power if this
facility is offline.

4a. This is a combined cycle facility that uses landfill gas as its
primary fuel. The principal components are the landfill gas
compressors and cooling equipment that supply fuel to the three
(3) European Gas Turbines (EGT) that turn individual generators.
Each turbine can produce approximately 4,800 kilowatts. Each EGT
turbine is equipped with an exhaust duct burner that uses
landfill gas to heat the exhaust gasses prior to a heat recovery
steam generator (HRSG). The three HRSGs produce high-pressure
steam that is directed to a single steam turbine that produces an
additional 10,000 kilowatts.

Expansion of the existing plant capacity will be with Solar Gas
Turbines used in a simple cycle to provide additional electrical
power up to another 10,000 kilowatts. The Solar turbines will be
fired exclusively on landfill gas provided by a separate gas
compression system. These turbines can produce approximately

3,300 kilowatts (gross) when the ambient air temperature is below 30 degrees Fahrenheit.

The generators are connected to the utility by individual circuit breakers that are in turn connected to a common bus that lead to a station transformer and utility metering equipment before tying into the utility.

- 4b. Maximum Facility Gross Electrical Output: 34,400 kW
Maximum Facility Net Electrical Output: 29,400 kW
The difference between gross and net output is the parasitic loads used within the facility that power gas compression and cooling equipment.
- 4c. This facility began operation in October of 1997. The first Solar Gas Turbine is scheduled to be installed and operational by September of 2003.
- 4d. This facility uses methane from landfill gas as it primary fuel.
5. Fossil fuel (#2 diesel) is used at this facility to ignite and start-up the EGT gas turbines. After synchronizing with the utility, the fuel source is switched to landfill gas. Fossil fuel use is less than one percent (1%) of the total average annual hourly energy input at this facility.
6. This facility generates electricity by burning methane in landfill gas that would otherwise be wasted by venting into a flare. Control of landfill gas methane has been recognized by the US EPA as a significant measure in the control of greenhouse gas.

PART B: DESCRIPTION OF THE SMALL POWER PRODUCTION FACILITY

7. The equipment installed at this facility uses methane in landfill gas as its primary fuel and only uses fossil fuel for electrical production during start-up.

Fossil fuel is limited to purposes conforming to Federal Power Act Section 3(17)(B) and, in particular is used for ignition and start-up.

Fossil fuel use is limited to no more than 25% of the total annual energy input from the landfill gas.

8. This facility is an eligible waste fuel facility per Section 3(17)(E) of the Federal Power Act. There are no other facilities within one mile owned by the same entities as the instant facility.